

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NATIONAL JOB CORPS ASSOCIATION,
JOCELYN RIVERA, ADAMS AND
ASSOCIATES, INC., ALTERNATE
PERSPECTIVES, INC., EDUCATION &
TRAINING RESOURCES, LLC,
STRATEGIX MANAGEMENT, LLC,
TRANSPORTATION COMMUNICATIONS
UNION/IAM,

Plaintiffs,

v.

DEPARTMENT OF LABOR, LORI
CHAVEZ-DEREMER, in her official capacity
as Secretary, Department of Labor,

Defendants.

Civil Case No. _____

**[PROPOSED] ORDER GRANTING TEMPORARY RESTRAINING ORDER AND
ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT
ISSUE**

UPON CONSIDERATION OF Plaintiffs' motion for a temporary restraining order and preliminary injunction and accompanying papers, it is hereby:

ORDERED that the motion for a Temporary Restraining Order is GRANTED.

It is DECLARED that Defendants' actions eliminating the Job Corps program, including but not limited to the issuance of termination and non-renewal notices by DOL starting on May 29, 2025, are unlawful, arbitrary and capricious, in excess of statutory authority, a violation of the Administrative Procedure Act, *ultra vires*, and in violation of the separation of powers.

It is further ORDERED that the stop work orders and termination and non-renewal

notices delivered to Job Corps center operators starting May 29, 2025, are VACATED, RESCINDED, AND RENDERED WITHOUT EFFECT.

It is further ORDERED that Defendants, their agents, and all persons acting in concert or participation with Defendants are ENJOINED from enforcing, implementing, maintaining or giving effect to the elimination of the Job Corps program, including the stop work orders and termination and non-renewal notices delivered to Job Corps center operators starting May 29, 2025; from issuing, enforcing, implementing, maintaining or giving effect to any shutdown tasks, job terminations, or student removals; and from taking any further action to eliminate the Job Corps program without Congressional authorization.

It is further ORDERED that the requirement that Plaintiffs post security pursuant to Federal Rule of Civil Procedure 65(c) is waived.

It is further ORDERED that the above named defendants show cause before a motion term of this Court, at Room ____, United States Courthouse, 500 Pearl Street, in the City, County and State of New York, on May ____, 2025, at ____ o'clock, or as soon thereafter as counsel may be heard, why an order should not be issued pursuant to Rule 65 of the Federal Rules of Civil Procedure.

IT IS SO ORDERED.

Dated: _____
New York, NY

U.S. District Judge